

Exhibit 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ICOMM TECHNOLOGIES, INC.,

Plaintiff

v.

**LG ELECTRONICS MOBILECOMM
U.S.A, INC.; MOTOROLA,
INCORPORATED; NOKIA INC.;
SAMSUNG TELECOMMUNICATIONS
AMERICA, L.P.,**

Defendants

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Civil Action No. 2:05-cv-00535-RC

JURY TRIAL DEMANDED

**PLAINTIFF ICOMM TECHNOLOGIES, INC.'S DISCLOSURE OF
ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS TO
SAMSUNG TELECOMMUNICATIONS AMERICA, L.P.**

Pursuant to the Rules of Practice for Patent Cases before the Eastern District of Texas 3-1 and 3-2, and the Court's Scheduling Order in this case, Plaintiff ICOMM Technologies, Inc. ("ICOMM"), provides the following Disclosure of Asserted Claims and Infringement Contentions to Defendant Samsung Telecommunications America, L.P. ("Samsung") regarding U.S. Patent Nos. 6,813,742 ("the '742 patent") and 6,799,295 ("the '295 patent").

I. P.R. 3-1: Disclosure of Asserted Claims and Infringement Contentions.

(a) Asserted Claims:

ICOMM asserts that Samsung infringes claims 1 and 3, 4, 6 and 7 of the '742 patent and claims 1, 22, 29, 32, 34 and 35 of the '295 patent (collectively "the Asserted Claims").

(b) Accused Products:

ICOMM accuses all of Samsung's 3G mobile phones made, used, sold or offered for sale in the United States since February 10, 2009 of infringement, as each model includes the turbo decoding technology disclosed and claimed in the '742 and '295 patents. Based upon ICOMM's investigation and without the benefit of discovery in this case, ICOMM accuses the following Samsung products of infringing the Asserted Claims:

Solstice (SGH-a887)
Jack (SGH-i637)
Impression (SGH-a877)
Eternity (SGH-a867)
SGH-a777
Propel (SGH-a767)
Propel Pro (SGH-i627)
Epix (SGH-i907)
Gravity 2 (SGH-t469)
Highlight (SGH-t749)
Comeback (SGH-t559)
Behold (SGH-t919)
Glyde (SCH-u940)
SGH-a657
SGH-a637
Memoir (SGH-t929)
Rugby (SGH-a837)
BlackJack II (SGH-i617)
Scarlett (SGH-t659)
SGH-t819
SGH-t639
SGH-a737
SGH-a736

The aforementioned products are collectively referred to as the “Accused Samsung Products.” ICOMM reserves the right to supplement this contention to include additional infringing products that ICOMM becomes aware of through discovery.

(c) Claim Charts:

Each of the Accused Samsung Products receives and process signals that have been encoded using a turbo encoder specified in accordance the 3G standard. The 3G turbo encoder is specified below (excerpt from 3GPP TS 25.212 V.6.10.0 (2006-12) (Release 6).

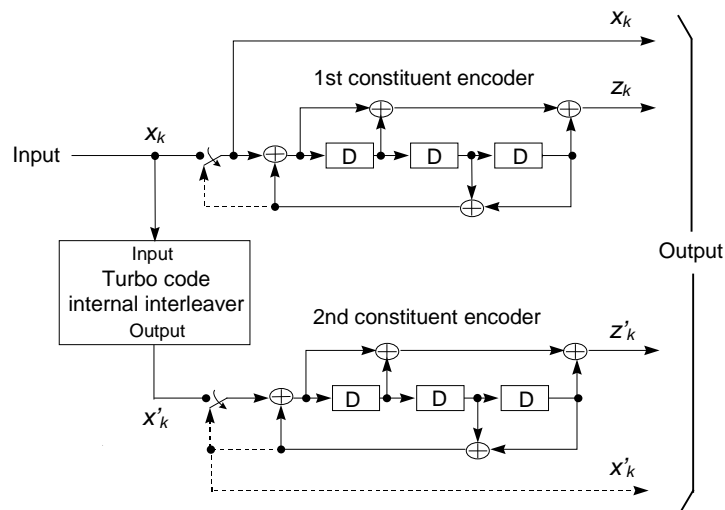
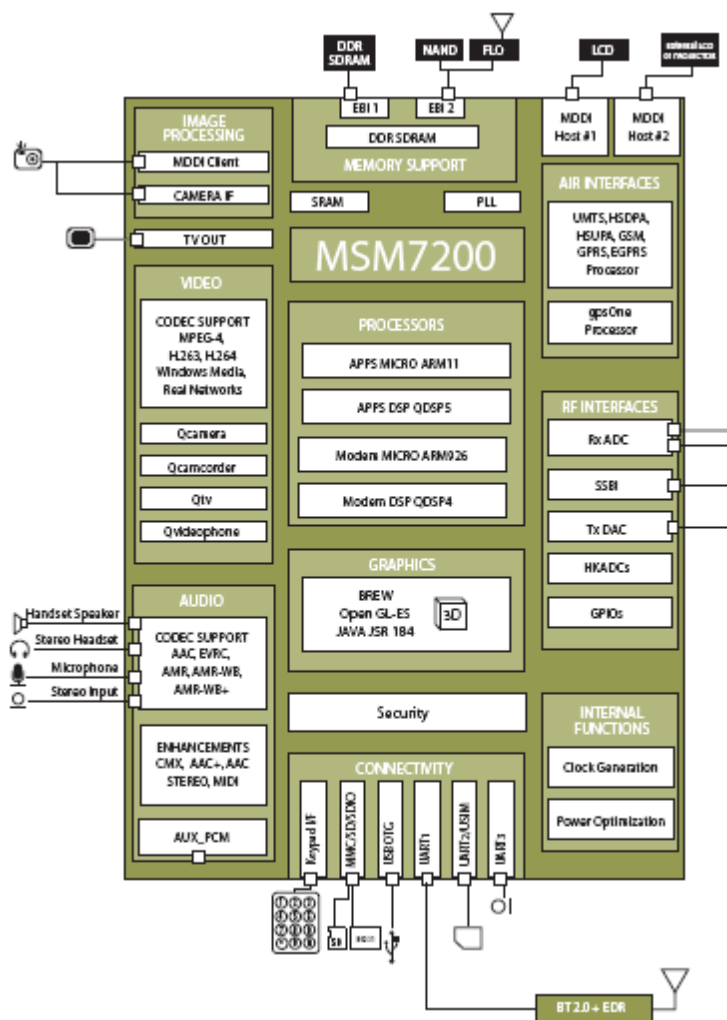


Figure 4: Structure of rate 1/3 Turbo coder (dotted lines apply for trellis termination only)

The turbo encoder specified by the 3G standard utilizes a Parallel Concatenated Convolutional Code (PCCC) with two 8-state constituent encoders and one Turbo code internal interleaver. The coding rate of Turbo coder is 1/3.

The infringing turbo decoding technology is embodied in a 3G WCDMA chipset in each of the Accused Samsung Products, and specifically in a baseband processor contained therein. Based on ICOMM’s initial investigation, the 3G WCDMA chipsets in the Samsung Accused

Products are supplied by Qualcomm, including but not limited to the MSM7201A. The MSM7201A chip is part of the MSM7200 family of which a block diagram is shown below.



The infringing turbo decoding technology is contained in the UMTS Processor (baseband processor) shown above in the Air Interfaces block. The claim charts below are based on information obtained by ICOMM to date without the benefit of discovery or proprietary information of Samsung or other third party chip suppliers. Proprietary information from the aforementioned parties is necessary to provide additional details regarding the operation of the infringing technology contained in the Samsung Accused Products. ICOMM reserves the right to supplement these contentions as discovery progresses and proprietary information is obtained.

In the claim charts below, ICOMM addresses an exemplary product, the Samsung Jack mobile phone which includes a Qualcomm MSM7201A wireless chipset. The other Samsung Accused Products include WCDMA baseband processors that infringe the Asserted Claims in the same manner.

6,813,742 Claim 1	Samsung Jack Mobile Phone
1. A baseband processor for iteratively processing a plurality sequences of received baseband digital signals, the baseband processor comprising:	The Samsung Jack mobile phone operates in compliance with the 3GPP standard. It includes an MSM7201A wireless chipset manufactured by Qualcomm. The wireless chipset incorporates a WCDMA baseband processor. The WCDMA baseband processor includes a turbo decoder that iteratively processes digital baseband signals encoded by a turbo encoder as specified in the 3G standard (shown above).
an input buffer comprising at least three shift registers, for receiving an input signal and generating first, second, and third shifted input signals;	The WCDMA baseband processor includes three shift registers adapted to receive data and shift three input signals representing the data being transmitted, a first set of parity bits, and a second set of parity bits.
at least two soft decision decoders including first and second soft decision decoders serially coupled in a circular circuit wherein each decoder processes soft decision from the preceding decoder output data in an iterative mode;	The WCDMA baseband processor includes a turbo decoder which has two max* log-MAP decoders. The max* log-map decoders operate in an iterative manner, wherein each max* log-MAP decoder is provided with an input comprising soft decision information from an output of the other max* log-map decoder.
at least one memory module that is electrically coupled to an output of a corresponding soft decision decoder, wherein the output of the memory module associated with a last soft decision decoder is fed back as an input to the first soft decision decoder, wherein the output of the memory module associated with the first soft decision decoder is fed as an input to the second soft decision decoder, wherein the last soft decision decoder receives	<p>The WCDMA baseband processor includes an interleaver with memory that interleaves the data output signal from the first max* log-MAP decoder. The interleaved output data from the first max* log-MAP decoder is then fed as an input into the second (last) max* log-MAP decoder.</p> <p>The WCDMA baseband processor includes a deinterleaver having memory that deinterleaves the data output from the second (last) max* log-</p>

output of the memory module associated with the preceding soft decision decoder.	MAP decoder. The deinterleaved output data from the second (last) max* log-MAP decoder is then fed as an input into the first max* log-MAP decoder.
wherein the first soft decision decoder further receives the first and second shifted input signals from the input buffer and the second soft decision decoder further receives the third shifted input signals from the input buffer.	The first max* log-MAP decoder in the WCDMA baseband processor receives the first shifted input signal and the second shifted input signal representing the data being transmitted, and one set of parity bits for determining probabilities relating to bit values of those bits comprising the signals provided to the first decoder. The third shifted input signal, representing a second set of parity bits, is provided to the second max* log-MAP decoder for determining probabilities relating to the bit values of those bits comprising the signal provided to the second decoder.

6,813,742 Claim 3	Samsung Jack Mobile Phone
3. The baseband processor according to claim 1, wherein each soft decision decoder uses a maximum a posteriori (MAP) probability algorithm, and/or a logarithm approximation algorithm.	The two soft decision decoders in the WCDMA baseband processor in the Samsung Jack mobile implement the max* log-MAP logarithmic approximation algorithm.

6,813,742 Claim 4	Samsung Jack Mobile Phone
4. The baseband processor according to claim 1, wherein each soft decision decoder implements concatenated convolutional codes.	The turbo decoder in the WCDMA baseband processor in the Samsung Jack mobile phone utilizes a parallel concatenated convolutional code.

6,813,742 Claim 6	Samsung Jack Mobile Phone
6. A method of iteratively decoding a plurality of sequences of received baseband signals, the method comprising:	The Samsung Jack mobile phone operates in compliance with the 3GPP standard. It includes an MSM7201A wireless chipset manufactured by

	Qualcomm. The wireless chipset incorporates a WCDMA baseband processor. The WCDMA baseband processor includes a turbo decoder that iteratively processes digital baseband signals encoded by a turbo encoder as specified in the 3G standard (shown above).
providing an input buffer comprising at least three shift registers, for receiving an input signal and generating first, second, and third shifted input signals;	The WCDMA baseband processor includes three shift registers adapted to receive transmitted data and shift three input signals representing the data being transmitted, a first set of parity bits, and a second set of parity bits.
providing first and second soft decision decoders serially coupled in a circular circuit, wherein each decoder processes soft decision from the preceding decoder output data, and wherein the first decoder further receives the first and second shifted input signals from the input buffer and the second decoder further receives the third shifted input signal from the input buffer;	The WCDMA baseband processor includes a turbo decoder which has two max* log-MAP decoders. The max* log-map decoders operate in an iterative manner, wherein each max* log-MAP decoder is provided with an input comprising soft decision information from an output of the other max* log-map decoder.
providing at least one memory module coupled to an output of each of the first and second soft decision decoders, wherein the output of the memory module associated with the second soft decision decoder is fed back as an input of the first soft decision decoder;	<p>The WCDMA baseband processor includes an interleaver with memory that interleaves the data output signal from the first max* log-MAP decoder. The interleaved output data from the first max* log-MAP decoder is then fed as an input into the second (last) max* log-MAP decoder.</p> <p>The WCDMA baseband processor includes a deinterleaver having memory that deinterleaves the data output from the second (last) max* log-MAP decoder. The deinterleaved output data from the second (last) max* log-MAP decoder is then fed as an input into the first max* log-MAP decoder.</p>
processing systematic information data and extrinsic information data using the maximum a posteriori (AP) probability algorithm, and/or logarithm approximation algorithm;	The max* log-MAP decoders process the input from the shift register and the input from the other decoder using the max* log-MAP logarithmic approximation algorithm.
generating soft decision based on the maximum a posteriori (MAP) probability algorithm, and/or logarithm approximation	The two max* log-MAP decoders in the WCDMA baseband processor use the max* log-MAP logarithmic approximation algorithm to

algorithm;	generate soft decisions, representing the probability that a bit is a one or a zero.
weighing and storing soft decision information into the corresponding memory module;	The interleavers with memory in the WCDMA baseband processor interleave and store the soft decision output from the max* log-MAP decoders.
performing, for a predetermined number of times, iterative decoding from the first to the last of multiple decoders, wherein an output from the last soft decision decoder is fed back as an input to the first soft decision decoder, then from the first to the second decoders, and propagate to the last decoder in a circular circuit.	The two max* log-MAP decoders in the WCDMA baseband processor perform repeat the computations for each iteration. After all iterations are complete, the decoded information bits can be retrieved for determining the value of the bit.

6,813,742 Claim 7	Samsung Jack Mobile Phone
7. The method according to claim 6, wherein the soft-in soft-out (SISO) maximum a posteriori (MAP) probability algorithm and logarithm approximation algorithm calculates the alpha function probability A(k) of each state transition in forward recursion and the beta function probability B(k) in backward recursion.	<p>The max* log-MAP decoders in the WCDMA baseband processor in the Samsung Jack Mobile Phone process baseband signals in an iterative manner, including performing a forward recursion, such as on an eight-state Trellis diagram by computing alpha for each node in the eight-state Trellis. Alpha is the sum of the previous alpha times the branch metric along each branch from the two previous nodes to the current node.</p> <p>A backward recursion on the eight-state Trellis is performed by computing beta for each node in the eight-state Trellis. The computation is the same as the alphas, but starting at the end of the eight-state Trellis and going in the reverse direction.</p> <p>$A(k) = \text{MAX} [(bm0 + sm0(k-1)), (bm1 + sm1(k-1))]$</p> <p>$B(j) = \text{MAX} [(bm0 + sm0(j+1)), (bm1 + sm1(j+1))]$</p>

6,799,295 Claim 1	Samsung Jack Mobile Phone
1. A baseband processing system for iteratively decoding data received on multiple data paths, the baseband processing system comprising:	The Samsung Jack mobile phone operates in compliance with the 3GPP standard. It includes an MSM7201A wireless chipset manufactured by Qualcomm. The wireless chipset incorporates a WCDMA baseband processor. The WCDMA baseband processor includes a turbo decoder that iteratively processes digital baseband signals encoded by a turbo encoder as specified in the 3G standard (shown above). Due to multipath effects, the Samsung Jack mobile phone receives multiple copies of transmitted signals via multiple paths.
At least one decoder adapted to received the data received on one or more of the multiple data paths, wherein each decoder comprises:	The WCDMA baseband processor includes a turbo decoder which has two max* log-MAP decoders. The max* log-map decoders are adapted to received the data received on one of the multiple data paths.
at least two soft decision decoders adapted to received data associated with corresponding data paths, wherein the at least two soft decision decoders are serially coupled and have at least a first soft decision decoder and a last decision decoder, wherein the last soft decision decoder is adapted to output data for the serially coupled series of soft decision decoders;	The WCDMA baseband processor includes a turbo decoder which has two max* log-MAP decoders. The max* log-map decoders operate in an iterative manner, wherein each max* log-MAP decoder is provided with an input comprising soft decision information from an output of the other max* log-map decoder.
at least one memory module that is electrically coupled to an output of a corresponding soft decision decoder, wherein the output of the memory module associated with the last soft decision decoder is fed back as an input to the first soft decision decoder of each of the at least one decoder	<p>The WCDMA baseband processor includes an interleaver with memory that interleaves the data output signal from the first max* log-MAP decoder. The interleaved output data from the first max* log-MAP decoder is then fed as an input into the second (last) max* log-MAP decoder.</p> <p>The WCDMA baseband processor includes a deinterleaver having memory that deinterleaves the data output from the second (last) max* log-MAP decoder. The deinterleaved output data from the second (last) max* log-MAP decoder is then fed as an input into the first max* log-MAP decoder.</p>

6,799,295 Claim 22	Samsung Jack Mobile Phone
22. The system according to claim 1, wherein each of the at least two soft decision decoders comprises:	The WCDMA baseband processor of the Samsung Jack mobile phone includes a turbo decoder which has two max* log-MAP decoders.
a branch metric module that is adapted to receive soft input data and is configured to compute branch metric values for each branch in a Trellis by calculating an Euclidean distance for each branch;	The two max* log-MAP decoders in the WCDMA baseband processor include a branch metric component that computes and stores the branch metrics (called gamma) for all branches in an eight-state Trellis using Euclidean distance metric calculations for each path in the eight-state Trellis.
a branch metric memory module that is coupled to the branch metric module and is adapted to store data associated at least with the branch metric values;	The max* log-MAP decoders in the WCDMA baseband processor include memory to store the computed branch metric values.
a state metric module that is coupled to the branch metric memory module and is configured to compute state metric values for each state in the Trellis using the computed branch metric values;	<p>The two max* log-MAP decoders in the WCDMA baseband processor include a state metric component that performs a forward recursion on the eight-state Trellis by computing alpha for each node in the eight-state Trellis. Alpha is the sum of the previous alpha times the branch metric along each branch from the two previous nodes to the current node.</p> <p>The state metric component also performs a backward recursion on the eight-state Trellis by computing beta for each node in the eight-state Trellis. The computation is the same as the alphas, but starting at the end of the eight-state Trellis and going in the reverse direction.</p>
an add-compare-select circuit that is coupled to the state metric module and is configured to compute state metric values at each node in the Trellis;	The state metric component in the two max* log-MAP decoders in the WCDMA baseband processor includes an add-compare-select operation configured to compute the state metric values at each node in the eight-state Trellis.
a state metric memory module that is coupled to the state metric module and is adapted to store data associated at least with the state metric values;	The max* log-MAP decoders in the WCDMA baseband processor include memory to store the computed state metric values.

a computation module that is coupled to at least the branch metric memory module and the state metric memory module, wherein the computation module is configured to compute a soft decision output based at least on the branch metric values and the state metric values; and	The max* log-MAP decoders in the WCDMA baseband processor include a computation component to compute the log likelihood ratio (LLR) (λ) for each t. This is the sum of the products of the alphas, betas, and gammas for each branch at time t that is associated with a 1 in the encoder, divided by the sum of the products of the alphas, betas, and gammas for each branch at time t that is associated with a 0 in the encoder.
a control logic state machine module that is adapted to control operations of at least one of the branch metric module, the branch metric memory module, the state metric module, the add-compare-select circuit, the state metric memory module, and the computation module.	The max* log-MAP decoders in the WCDMA baseband processor include control logic that controls operations of the branch metric, the state metric, and the computation LLR components.

6,799,295 Claim 29	Samsung Jack Mobile Phone
29. The system according to claim 1, wherein each of the at least two soft decision decoders comprises:	The WCDMA baseband processor of the Samsung Jack mobile phone includes a turbo decoder which has two max* log-MAP decoders.
branch metric means for receiving soft input data and computing branch metric values for each branch in a Trellis by calculating an Euclidean distance for each branch;	The two max* log-MAP decoders in the WCDMA baseband processor include a branch metric component that computes and stores the branch metrics (called gamma) for all branches in an eight-state Trellis using Euclidean distance metric calculations for each path in the eight-state Trellis.
branch metric memory means for storing data associated at least with the branch metric values;	The max* log-MAP decoders in the WCDMA baseband processor include memory to store the computed branch metric values.
state metric means for computing state metric values for each state in the Trellis using the computed branch metric values;	The two max* log-MAP decoders in the WCDMA baseband processor include a state metric component that performs a forward recursion on the eight-state Trellis by computing alpha for each node in the eight-state Trellis. Alpha is the sum of the previous alpha times the branch metric along each branch from the two previous nodes to the current node.

	The state metric component also performs a backward recursion on the eight-state Trellis by computing beta for each node in the eight-state Trellis. The computation is the same as the alphas, but starting at the end of the eight-state Trellis and going in the reverse direction.
add-compare-select means for computing state metric values at each node in the Trellis;	The state metric component in the two max* log-MAP decoders in the WCDMA baseband processor includes an add-compare-select operation configured to compute the state metric values at each node in the eight-state Trellis.
state metric memory means for storing data associated at least with the state metric values;	The max* log-MAP decoders in the WCDMA baseband processor include memory to store the computed state metric values.
computation means for computing a soft decision output based at least on the branch metric values and the state metric values; and	The max* log-MAP decoders in the WCDMA baseband processor include a computation component to compute the log likelihood ratio (LLR) (lambda) for each t. This is the sum of the products of the alphas, betas, and gammas for each branch at time t that is associated with a 1 in the encoder, divided by the sum of the products of the alphas, betas, and gammas for each branch at time t that is associated with a 0 in the encoder.
control logic state machine means for controlling operations of at least one of the branch metric means, the branch metric memory means, the state metric means, the add-compare-select means, the state metric memory means, and the computation means.	The max* log-MAP decoders in the WCDMA baseband processor include control logic that controls operations of the branch metric, the state metric, and the computation LLR components.

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6,799,295 Claim 32	Samsung Jack Mobile Phone
32. The baseband processing system according to claim 1,	The Samsung Jack mobile phone includes a WCDMA baseband processor.
wherein the output of the memory module associated with the first soft decision	The WCDMA baseband processor includes an interleaver with memory that interleaves the data

<p>decoder is fed back as an input to the last soft decision decoder, and</p> <p>wherein the at least one decoder further comprises: at least one interleaver coupled to the memory module associated with the first soft decision decoder, and at least one de-interleaver coupled to the memory module associated with the last soft decision decoder.</p>	<p>output signal from the first max* log-MAP decoder. The interleaved output data from the first max* log-MAP decoder is then fed as an input into the second (last) max* log-MAP decoder.</p> <p>The WCDMA baseband processor includes a deinterleaver having memory that deinterleaves the data output from the second (last) max* log-MAP decoder. The deinterleaved output data from the second (last) max* log-MAP decoder is then fed as an input into the first max* log-MAP decoder.</p>
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6,799,295 Claim 34	Samsung Jack Mobile Phone
The baseband processing system according to claim 1,	The Samsung Jack mobile phone includes a WCDMA baseband processor.
wherein the data is received on the multiple data paths from one or more antennas and pre-processed by one or more receivers, and wherein at least one of the at least two soft decision decoders is adapted to iteratively process the pre-processed data.	<p>The Samsung Jack mobile phone receives signals transmitted by an antenna at a cellular base station. Due to multipath effects, multiple copies of the signals are received via multiple paths. The mobile phone includes a radio frequency (RF) chip that receives, downconverts and demodulates the received signals.</p> <p>The WCDMA baseband processor takes the demodulated signals as input from the RF chip. The max* log-MAP decoders in the WCDMA baseband processor iteratively decode the demodulated signals.</p>

6,799,295 Claim 35	Samsung Jack Mobile Phone
A baseband processing system according to claim 1,	The Samsung Jack mobile phone includes a WCDMA baseband processor.
wherein the data is received on the multiple data paths from a single antenna,	The Samsung Jack mobile phone receives signals transmitted by an antenna at a cellular base station. Due to multipath effects, multiple copies of the signals are received via multiple paths.

<p>wherein the output of the memory module associated with the first soft decision decoder is fed back as an input to the last soft decision decoder, and wherein the at least one decoder further comprises at least one interleaver coupled to the memory module associated with the first soft decision decoder, and at least one deinterleaver coupled to the memory module associated with the last soft decision decoder.</p>	<p>The WCDMA baseband processor includes an interleaver with memory that interleaves the data output signal from the first max* log-MAP decoder. The interleaved output data from the first max* log-MAP decoder is then fed as an input into the second (last) max* log-MAP decoder.</p> <p>The WCDMA baseband processor includes a deinterleaver having memory that deinterleaves the data output from the second (last) max* log-MAP decoder. The deinterleaved output data from the second (last) max* log-MAP decoder is then fed as an input into the first max* log-MAP decoder.</p>
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(b) Literal Infringement/Doctrine of Equivalents:

ICOMM contends that the Accused Samsung Products literally meet each of the Asserted Claims; however, ICOMM reserves the right to assert infringement under the doctrine of equivalents upon receiving the Court's claim construction or after further discovery in the litigation.

(e) Priority Information:

The Asserted Claims of the '742 and '295 patents are entitled to the benefit of the filing date of U.S. Patent App. No. 09/681,093, filed on January 2, 2001, which led to the '742 patent.

(f) ICOMM Products:

ICOMM provides its 3GPP Turbo Codes Codec which embodies the inventions claimed in the '742 and '295 patents.

II. P.R. 3-2: Document Production Accompanying Disclosure.

ICOMM is producing documents with the bates range ICOMM 0000001-0001505 along with its Infringement Contentions.

Date: August 24, 2009

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ICOMM TECHNOLOGIES, INC.,

Plaintiff

v.

**LG ELECTRONICS MOBILECOMM
U.S.A, INC.; MOTOROLA,
INCORPORATED; NOKIA INC.;
SAMSUNG TELECOMMUNICATIONS
AMERICA, L.P.,**

Defendants

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Civil Action No. 2:05-cv-00535-RC

Jury Trial Demanded

CERTIFICATE OF SERVICE

I am a citizen of the United States, over the age of eighteen years, and I am not a party to the foregoing action. My business address is 1177 West Loop South, Suite 400, Houston, TX 77027.

I HEREBY CERTIFY that on the 24th day of August 2009, in Case No. 2:05-cv-535-RC, a copy of the following document has been served on all counsel of record set forth below:

**PLAINTIFF ICOMM TECHNOLOGIES, INC.'S DISCLOSURE OF
ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS TO
SAMSUNG TELECOMMUNICATIONS AMERICA, L.P.**

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